

# EXHIBIT H

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ,  
HANNAH PEARCE, MARCUS MARTIN,  
NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCH”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**DECLARATION OF MICHAEL BLOCH IN SUPPORT OF PLAINTIFFS’  
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Michael Bloch, on this 11th day of June 2021, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am Counsel at the law firm Kaplan Hecker & Fink LLP (“Kaplan”), one of the law firms representing the Plaintiffs in this action.

2. I submit this Declaration in support of Plaintiffs’ Submission Regarding Venue For Trial and Trial Logistics.

3. Except to the extent otherwise expressly indicated, I have personal knowledge of the matters set forth in this Declaration.

4. Several third-party witnesses, who reside in and around Charlottesville, Virginia, were eyewitnesses to either the torch lit march held on the University grounds on the evening of August 11 or the violence on August 12, 2017. Among these witnesses are two University of Virginia professors, a University of Virginia administrator, and a University of Virginia photographer, each of whom were eyewitnesses. Their testimony is material and necessary, including to authenticate photographs of the event. Among other things, they will testify about the rally-goers’ march across the Lawn at the University of Virginia, the chants they heard, and the violence they observed, including the instigation of the violence against the counter-protestors gathered at the Thomas Jefferson statue. Another witness will testify about the violence she observed from rally-goers on the morning of August 12, 2017, and she will testify about the racial animus that she observed from some of the defendants that day. For each of those third-party witnesses a trial held in Lynchburg or Roanoke would be less convenient than a trial held in Charlottesville.

5. Attached as Exhibit 1 is a true and correct copy of an excerpt of the Deposition Transcript of Richard Spencer taken on July 1, 2020 by Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 11, 2021  
New York, New York.

  
\_\_\_\_\_  
Michael Bloch

# EXHIBIT 1



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1 R. SPENCER  
2 12:00 p.m. declaration of emergency, I mean, I  
3 think my adrenaline was very high for the rest  
4 of the day. I mean, we had -- I was shocked by  
5 the way things had happened, and I was  
6 generally appalled by the fact that chaos had  
7 broken out. So I was in a, you know, agitated  
8 state, to say the least. Very angry at the  
9 authorities. I mean, you can see that in that  
10 video that I watched.  
11 MR. BLOCH: Okay. Emily, can we  
12 show Tab 13, please? And I believe this is  
13 going to be marked Exhibit 43; is that  
14 right?  
15 MS. COLE: Yes.  
16 (Deposition Exhibit Number 43 marked  
17 for identification.)  
18 Q. Mr. Spencer, I'm going to play --  
19 it's an audio and ask you to listen, and I'll  
20 ask you questions about it after.  
21 MS. COLE: Can we just go off the  
22 record for one second?  
23 MR. BLOCH: Sure.  
24 THE VIDEOGRAPHER: We're going off  
25 the record at 4:32 p.m.

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1 R. SPENCER  
2 A. Okay.  
3 (Deposition Exhibit Number 44 marked  
4 for identification.)  
5 (Audio played.)  
6 Q. Mr. Spencer, is what was just played  
7 in Exhibit 44 a fair and accurate recording of  
8 you speaking at the after party on August 12th,  
9 2017?  
10 A. Yes.  
11 Q. And who were you speaking with when  
12 you said those things?  
13 A. That wasn't exactly at the after  
14 party itself, which was a fairly large event.  
15 That was in a small room where there were a few  
16 of us had gathered and we were kind of talking  
17 about what we were going to do. So it was a  
18 small-ish crowd of, you know, Nathan Damigo,  
19 Jason Kessler, myself, Greg Conte, Eli Kline,  
20 Patrick Casey most likely, and maybe one or two  
21 others, so it was kind of like we were up in a  
22 room in the after party.  
23 Q. Okay. And did you hear yourself say  
24 "Little fucking kikes"?  
25 A. Yes, I did hear that.

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1 R. SPENCER  
2 (A short break was taken.)  
3 THE VIDEOGRAPHER: We're back on the  
4 record at 4:35 p.m.  
5 Q. Okay. Mr. Spencer, I'm playing for  
6 you Exhibit 43.  
7 (Video played.)  
8 Q. I'm sorry. Mr. Spencer -- why don't  
9 we go off the record. I want to go off the  
10 record for one more second. I think we have  
11 the wrong exhibit. I'm sorry for the  
12 confusion.  
13 A. Okay.  
14 THE VIDEOGRAPHER: Okay. We're  
15 going off the record at 4:36 p.m.  
16 (A short break was taken.)  
17 THE VIDEOGRAPHER: We are back on  
18 the record at 4:44 p.m.  
19 Q. All right. Mr. Spencer, I'm going  
20 to -- we're going to mark a new exhibit,  
21 Exhibit 43. And so I'm now going to play for  
22 you exhibit -- I'm sorry. We are going to mark  
23 a new exhibit, Exhibit 44. And I'm now going  
24 to play for you Exhibit 44. So please take a  
25 listen.

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1 R. SPENCER  
2 Q. And who were you referring to when  
3 you said little fucking kikes?  
4 A. Well, I mean, obviously Jewish  
5 people. But it was, you know -- you know,  
6 obviously that whole rant was expression of  
7 extreme anger. I'm not sure exactly if I was  
8 talking about one person in particular.  
9 Q. And which Jewish -- well, let me  
10 come back to that.  
11 You also heard yourself say "Little  
12 fucking octoroons"?  
13 A. I heard octoroons in there, yes.  
14 Q. And who is it that you were  
15 referring to when you said octoroons?  
16 A. Well, again, I don't think that was  
17 directed at any one person. You know, it's  
18 almost an expression of an African-American  
19 person who works in, you know, local government  
20 or something like that or who's popular in the  
21 media who is of a mixed ancestry.  
22 Q. But, generally speaking, would it be  
23 fair to say that when you're referring to kikes  
24 and octoroons, you were referring to the people  
25 of Charlottesville generally?